SHELSBY & LEONI

GILBERT F. SHELSBY, JR. (MD, DC, DE)*
ROBERT J. LEONI (DE)*
KYLE KEMMER (DE, PA)
R. SCOTT KAPPES (DE)
JAMES J. MEEHAN, III (DE)

* Also Of Counsel with Kline & Specter, P.C.

A PROFESSIONAL ASSOCIATION

STACEY L. PAOLI (PA)

221 MAIN STREET WILMINGTON, DELAWARE 19804 PHONE: 302-995-6210 FAX: 302-995-6121 www.shelsbyleonilaw.com

March 10, 2017

VIA ELECTRONIC FILING

The Honorable Judge Ellen L. Hollander United States District Court 101 West Lombard Street Baltimore, Maryland 21201

Re: Ronald H. Clark, et al. v. Your Doc's In, et al.

Civil No.: ELH-15-2254

Dear Judge Hollander:

After the pre-trial conference last Friday, the parties engaged in discussions about potentially resolving this matter without need for a jury trial. We have agreed to submit the case to a binding arbitration before an arbitrator that has been selected by the parties. As part of the agreement, the parties will submit their evidence to the arbitrator who will decide liability and if necessary, damages. Whatever that determination is, would be binding on the parties. In the event of a verdict on behalf of the Plaintiff, the parties have agreed that the Plaintiffs would execute a Release with confidentiality and after payment of the award, a Stipulation of Dismissal would be filed with the Court. In the event of a verdict for the Defendant, a Stipulation of Dismissal with prejudice would be filed immediately.

The parties respectfully request that the Court permit us to proceed to arbitration with a continuance of the trial date and after resolution by arbitration, to file the Stipulation of Dismissal.

The Honorable Judge Ellen L. Hollander March 10, 2017 Page **2** of **2**

Counsel are available for a conference to address this issue if the Court desires a conference.

Respectfully submitted,

/s/ Gilbert F. Shelsby, Jr.

Gilbert F. Shelsby, Jr.

GFS:bh

cc: Michael C. Rosendorf, Esquire Frances O'Leary, Esquire